

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

UNITED STATES OF AMERICA

vs.

JOSE SALINAS

CRIMINAL NO. 1:21-CR-00440

MOTION FOR CONTINUANCE

COMES NOW, Jose Salinas, Defendant in the above-entitled and numbered cause by and through his attorney of record, Mr. Noé D. Garza, Jr., and files this Motion for Continuance and in support thereof would show the Court as follows:

I.

Defendant's case is scheduled for a motion hearing on November 23, 2021, at 9:00 a.m. before U.S. Magistrate Ronald G. Morgan. Defendant is scheduled for a docket call and final pretrial conference hearing on November 30, 2021, at 8:30 a.m. and for jury selection on December 06, 2021, at 9:00 a.m. before the Honorable Federal District Judge Fernando Rodriguez Jr.

II.

Defendant is requesting to continue his motions hearing due to ongoing plea negotiations.

III.

Defendant's counsel has conferred with Assistant United States Attorney David Agustin Lindenmuth, and he does not oppose Defendant's motion for continuance.

IV.

This motion for continuance is not sought for purposes of delay, but so that justice may be served.

WHEREFORE, Defendant respectfully requests that motions hearing, docket call and final pretrial conference and jury selection be continued for a period of 60 days.

Respectfully submitted,

Law Office of Noé D. Garza, Jr.
854 East Van Buren Street
Brownsville, Texas 78520
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By: /s/ Noé D. Garza, Jr.
Noé D. Garza, Jr.
State Bar No. 07736010
Federal ID No. 8652

CERTIFICATE OF CONSULTATION

I, Noé D. Garza, Jr., do hereby certify that on November 17, 2021, I did confer with Assistant United States Attorney David Agustin Lindenmuth Defendant's Motion for Continuance, and he does not oppose defendant's motion.

/s/ Noé D. Garza, Jr. _____
Noé D. Garza, Jr.

CERTIFICATE OF SERVICE

I, Noé D. Garza, Jr., do hereby certify that a true and correct copy of Defendant's Motion for Continuance has been forwarded to the parties listed below via electronic filing:

United States District Clerk's Office
600 East Harrison Street
Brownsville, Texas 78520

Mr. David Agustin Lindenmuth
Assistant United States Attorney
600 East Harrison Street
Brownsville, Texas 78520
Email: David.lindenmuth@usdoj.gov

on this 19th day of November 2021.

/s/ Noé D. Garza, Jr. _____
Noé D. Garza, Jr.